

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:19-CR-371-L

LESLY ANAISS MURGA (05)

**FACTUAL RESUME**

In support of Murga's plea of guilty to the offense in Count Five of the Indictment, Murga, the defendant, Louis Lopez, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

**ELEMENTS OF THE OFFENSE**

To prove the offense alleged in Count Five of the Indictment, charging a violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and (ii) and 1956(h), that is, Conspiracy to Launder Drug Proceeds, the government must prove each of the following elements beyond a reasonable doubt:<sup>1</sup>

- First.* That the defendant knowingly combined, conspired, confederated, or agreed with others;
- Second:* to knowingly conduct a financial transaction;
- Third.* that the financial transaction involved the proceeds of a specified unlawful activity, namely drug trafficking;
- Fourth.* That the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity; and
- Fifth.* That the defendant knew the transaction was designed in whole or part to conceal or disguise the nature, location source, ownership, or

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<sup>1</sup> Pattern Crim. Jury Instr. 5th Cir. 2.76(a) (2015) and 18 U.S.C. § 1956(h).

control of the proceeds of the specified unlawful activity.

**STIPULATED FACTS**

1. In or about June 2019, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, Lesly Anaiss Murga did knowingly combine, conspire, confederate, and agree with others known and unknown to the grand jury, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce which involved the proceeds of specified unlawful activity, to wit: conspiracy to possess with intent to distribute and possession with intent to distribute methamphetamine in violation of 21 U.S.C. §§ 846 and 841(a)(1), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and (1) knowing that the transactions were designed in whole or part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity and (2) knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under Federal law.

2. More specifically, on June 18, 2019, Murga engaged in a phone conversation with another conspirator wherein Murga agreed to pick up an drug proceeds from another conspirator at an IHOP located at 1626 W. Mockingbird, Dallas, Texas. As agreed, Murga picked up the drug proceeds, which included \$42,800 of United States currency, wrapped in black tape and \$10,800 in a folded stack inside a purse. As Murga admitted to officers, she ~~was sent to Dallas, Texas by a Juarez, Mexico-based drug trafficker.~~ *knew the money was proceeds of drug trafficking* <sup>CK</sup> <sub>AM</sub> Murga stated she departed El Paso, Texas on June 17, 2019 and arrived in

Dallas, Texas later that evening. Murga stated she was to drive the money back to El Paso, then receive further direction from Mexico-based drug traffickers.

*on what to do with the money.*


*ck  
am*

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3. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count Five of the Indictment.

AGREED TO AND STIPULATED on this 30th day of March, 202<sup>2</sup>~~1~~.

  
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LESLY ANAISS MURGA  
Defendant

  
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~~LOUIS LOPEZ~~ CAMILLE M. KNIGHT  
Attorney for Defendant

CHAD MEACHAM  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
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